## MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

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February 23, 2004

The Honorable Bruce F. Duke Executive Director South Carolina Public Service Commission Synergy Business Park 101 Executive Center Drive Columbia, South Carolina 29210

Re: Intrastate Universal Service Fund Docket No. 1997-239-C

Dear Mr. Duke:

I am writing in response to the Motion to Compel Discovery Responses by Bluffton Telephone Company, Inc., Hargray Telephone Company, Inc., Home Telephone Company, Inc., Horry Telephone Cooperative, Inc., and PBT Telecom ("Telephone Companies"), which was filed by the South Carolina Cable Television Association (SCCTA) in the above-referenced proceeding.

The Telephone Companies do not believe the information requested by SCCTA is relevant in any way to the instant proceeding. As is evident in the Motion to Compel, the SCCTA seeks the requested information in order to raise issues that have previously been considered and rejected by the Commission in earlier proceedings held in this docket. However, the Telephone Companies are willing to provide as much of the requested information as is available, subject to the terms of the Protective Agreement between the Telephone Companies and SCCTA in this docket and without waiving any rights they may have to object to the relevance or admissibility of any such information at the hearing on this matter. As I told Mr. Ellerbe last week, the Telephone Companies' consultant in this matter, John Staurulakis, Inc., is currently gathering and compiling this information, and we will provide responses to SCCTA by the end of this week. We, therefore, respectfully request that the Commission dismiss SCCTA's Motion to Compel as moot.

## MCNAIR LAW FIRM, P.A. ATTORNEYS AND COUNSELORS AT LAW

The Honorable Bruce F. Duke February 23, 2004 Page 2

Thank you for your assistance in this matter.

Very truly yours,

/s/

M. John Bowen, Jr.

Frank R. Ellerbe, III cc: Parties of Record